## Andrew J. Mollica

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## **VIA ECF FILING**

Hon. P. Kevin Castel
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York NY 10007

Re: United States v. Grasso et al., 20-Cr. 163 (PKC)

Dear Judge Castel:

I write on behalf of my client, Connor Flynn, to respectfully request that the Court modify the current bail conditions that restrict Mr. Flynn's travel to the Southern and Eastern Districts of New York.

[We seek to extend the travel conditions to allow Mr. Flynn and his family to travel to the District of Massachusetts (by car) from on or about August 6, 2020 to on or about August 12, 2020.]

Mr. Flynn's parents reside in North Attleboro Massachusetts, which is within the District of Massachusetts, and my client seeks this travel modification so that he may take his two-year-old daughter and pregnant wife to visit Mr. Flynn's parents.

Mr. Flynn informed Pre-Trial services of his proposed trip and he informs me they have no objection. On behalf of the government, Sarah Montazavi, Esq. has graciously consented to this request.

Application Granted.

So Ordered:

Respectfully submitted,

/s/

Andrew J. Mollica

On behalf of Connor Flynn

P. Kevin Castel United States District Judge

7/22/2020